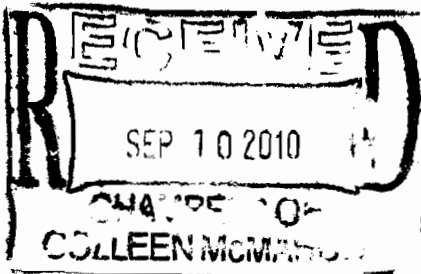


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MEMO ENDORSED

September 10, 2010

VIA FACSIMILE

The Honorable Colleen McMahon
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: CWA, et al. v. Verizon Communications, Inc., et al.
09-CV-9175 (CM) (MHD)

US SDNY
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FILED

9/10/10

Dear Judge McMahon:

As Your Honor knows, we represent Defendants in the above-referenced action. We write on behalf of all parties to respectfully request an additional 90 days, up to and including December 13, 2010, to complete class discovery. Class discovery is currently set to close on September 13, 2010. This is the parties' second request for an extension of the class discovery deadline. There are no other scheduled dates that this extension would impact.

The number of named plaintiffs, the size of the putative class (estimated by plaintiffs to exceed 40,000 individuals) and wide scope of the allegations in the 98-page Amended Complaint have led to a high volume of discovery, notwithstanding the limited "class discovery" ordered by the Court. To date, Defendants have deposed 18 of the remaining 45 named plaintiffs. Following requests to depose them, 4 additional named plaintiffs have withdrawn from the action. The parties have scheduled the depositions of 8 additional Plaintiffs, leaving 19 depositions remaining to be scheduled. These deponents live throughout the Northeast and mid-Atlantic, and thus require time and some efforts to schedule. In addition, the parties have exchanged tens of thousands of pages of documents and initiated discovery of electronically-shared information. Defendants also are in the process of gathering documents and information from 20 local offices of the Communications Workers of America ("CWA"), as well as Plaintiffs' health care providers and other third parties. In addition, Defendants and the CWA International union will be producing witnesses in response to Rule 30(b)(6) deposition notices. Defendants have identified witnesses in response to plaintiffs' Fed. R. Civ. P. 30(b)(6) notices and the parties are in the process of arriving at mutually convenient

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The Honorable Colleen McMahon
September 10, 2010
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dates upon which to hold those depositions. The parties also are in the process of coordinating Fed. R. Civ. P. 30(b)(6) depositions for the CWA International union.

As we are sure Your Honor can appreciate, the parties have made great strides during the time the Court has already generously allowed but additional time is needed. We note that the parties have cooperated in the resolution of discovery disputes and resolving issues, and thus far have not required court intervention to assist in such resolution. These largely successful efforts have taken some time, but ultimately serve the interests of judicial economy. Finally, we require some additional time because I will be engaged in a trial from October 12 through approximately October 22, 2010 in New Jersey state court while my co-counsel, Krista Pratt, will soon be taking a maternity leave of absence.

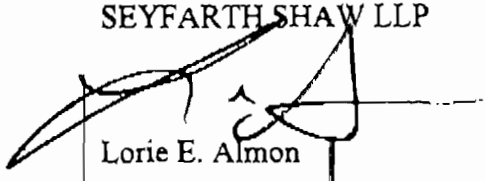
It is the parties' intent that no further extensions should be needed should the Court grant this request. It is for that reason and to demonstrate the parties' strong interest in advancing the case, that the parties respectfully request that Your Honor consider and endorse the following briefing schedule for Plaintiffs' anticipated motion for class certification:

- Plaintiffs to serve and file their anticipated motion for class certification by no later than January 31, 2011.
- Defendants to serve and file their opposition to Plaintiffs' anticipated motion for class certification by no later than March 14, 2011.
- Plaintiffs to serve and file their reply in further support of their anticipated motion for class certification by no later than March 28, 2011.

Thank you for Your Honor's courtesy in considering this request.

Respectfully submitted,

SEYFARTH SHAW LLP



Lorie E. Almon

cc: Daniel Clifton (via facsimile)
Louie Nikolaidis (via facsimile)
Mary K. O'Melveny (via facsimile)
Gabrielle Semel (via facsimile)
Arthur Telegen
Krista Pratt